

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

BLEUS & ASSOCIATES, LLC

Attorneys for Taylor Sorensen
2633 Dakota NE
Albuquerque, New Mexico 87110
Office: (505)884-9300
Fax: (505)884-9305
George Anthony Bleus
bleusandassociates@gmail.com
Admission *pro hac vice* pending

Date and Time of Hearing: 5/21/10 at 10:00 a.m.

In re:

**SEARS HOLDING CORPORATION, and
K-MART CORPORATION, et al.,**

**Chapter 11
Case No. 18-23538 (RDD)
(Jointly administered)**

Debtors.

**NOTICE OF HEARING MOTION OF TAYLOR SORENSEN'S PERSONAL
REPRESENTATIVE OF THE WRONGFUL DEATH ESTATE OF JONATHAN
SORENSEN, FOR AN ORDER FOR RELIEF FROM THE AUTOMATIC STAY
PURSUANT TO SECTION 362(d) OF THE BANKRUPTCY CODE**

PLEASE TAKE NOTICE that on May 21, 2019 at 10:00 a.m. (Prevailing Eastern Time), or as soon thereafter as counsel may be heard, a hearing will be held before the Honorable Robert D. Drain, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, 300 Quarropas Street, White Plains, New York 10601 on the annexed Motion dated May 14, 2019 (the "Motion") of Taylor Sorensen's Personal Representative of the Wrongful Death Estate of Jonathan Sorensen ("Movant"), by his counsel Bleus and Associates, George Anthony Bleus, Esq., for an Order granting relief from the automatic stay pursuant to Section 362(d) of the Bankruptcy Code, to permit Movant to pursue and prosecute the wrongful death action ("State Court Action") against Kmart Operations LLC,

Kmart Corporation, Jonathan Pendley, Edward Fleming, Josephine Waldrep, and Darren Roybal in the First Judicial District, County of New Mexico, State of New Mexico, and granting such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion must be (i) made in writing which specifies the name and docket number of this case, the nature of and specific reason for and basis of the objection, the identity of the objecting entity (with address, telephone number, and if available, fax number and e-mail) which conforms to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, shall be filed with the Bankruptcy Court (a) by attorneys practicing in the Bankruptcy Court, including attorneys admitted *pro hac vice*, electronically in accordance with General Order M399 (which can be found at www.nysb.uscourts.gov), and (b) by all other parties in interest in text-searchable portable document format (PDF) (with a hard copy delivered directly to Chambers), in accordance with the customary practices of the Bankruptcy Court and General Order M-399, to the extent applicable, and shall be served in accordance with the Court's Amended Order Implementing Certain Notice and Case Management Procedures, entered on November 1, 2018, on (i) George Anthony Bleus, Bleus and Associates, 2633 Dakota NE, Albuquerque, New Mexico 87110 counsel for Movant, and (ii) Office of The United States Trustee, Attn: Richard Morrissey, 201 Varick St. Ste. 1006, New York, NY 10014, 2018 (Docket No. 405).

PLEASE TAKE FURTHER NOTICE that if no Objections are timely filed and served as set forth above, the relief requested in the Motion may be granted with no further notice or opportunity to be heard.

PLEASE TAKE FURTHER NOTICE that any objecting parties are required to attend

the Hearing and failure to appear may result in relief being granted upon default.

Dated: May 14, 2019

BLEUS & ASSOCIATES, LLC

By:/s/ George Anthony Bleus

George Anthony Bleus, Esq.

Admission Pro Hac Vice Pending

Attorney for Movant Taylor Sorensen

2633 Dakota NE

Albuquerque, New Mexico 87110

Office: (505) 884-9300

Fax: (505) 884-9305

bleusandassociates@gmail.com